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DEPARTMENT OF THE NAVY
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IN REPLY REFER TO
5090
1823:LSL:cag
JUN 02 2000

U.S. Environmental Protection Agency
Region IV
Attn: Mrs. Michelle Thornton
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

Subject: RESPONSE TO USEPA COMMENTS (DATED MARCH 27, 2000) SCREENING LEVEL RISK ANALYSIS FOR OPERABLE UNIT 13, MARINE CORPS AIR STATION CHERRY POINT, NORTH CAROLINA

Dear Mrs. Thornton:

Enclosed please find the following copy of the response to your comments dated May 27, 2000 on the Screening Level Risk Analysis For Operable Unit 13.

If you have any questions, feel free to call me at (757) 322-4811.

Sincerely,

LANCE S. LAUGHMILLER, P.E.
Remedial Project Manager
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Enclosures

Copy to:
NC DENR, Superfund Section (Ms. Linda Raynor)
MCAS Cherry Point, EAD (Mr. Dale McFarland)
MCAS CHPT Admin Record

Response to Comments
Michelle P. Thornton (EPA), May 15, 2000
Long Term Monitoring Remedial Action Plan
Soil Vapor Extraction Remediation System
Operable Unit 02, Soils
MCAS Cherry Point, North Carolina

Response to Comments

Comment:
1. Page 7-4, 2nd paragraph: Will any additional confirmation sampling be done after system shutdown and the one week event? Suggest limited or extensive sampling after one month.

Response to Comment No. 1:
Additional confirmation sampling will be based upon system performance and the available data. The methodology is described in the paragraphs below, this text will be inserted into the LTRA on page 7-4 following the second paragraph.

Data collected during the operation of the system will be reviewed prior to shutting down the system. A phased approach for shutting down select SVE wells will follow the following procedures:

- *Prior to shutting down the flow from a specific SVE well, the total flow would be measured in the vapor stream from the well.*
- *A vapor sample would then be collected in a Tedlar bag using a pump to capture the sample. The VOC concentration in the Tedlar bag would be measured with a flame ionization detector (FID). Both the flow and VOC concentration would be measured with the time and date.*
- *If the VOC concentration were greater than 10 parts per million (ppm), the SVE well would not be removed from operation. This relatively high concentration indicates that the VOCs within the radius of influence (ROI) of the SVE well have not been removed.*
- *If the VOC concentration were less than 10 ppm, the SVE well would be shut down. This relatively low concentration indicates that the VOCs within the ROI of the SVE well have been removed.*

The SVE well would then be left shut down for approximately 2 weeks to allow the soils surrounding the well to reach physical equilibrium. Preferential pathways that may have developed in the subsurface will be allowed to close. Confirmation checks that the soils within the ROI have been remediated would be initiated. The confirmation check would be performed as follows:

- *The SVE would be restarted to determine if all of the contaminants had been removed within the ROI. Following the return of the SVE to operation the flow and VOC concentration would be measured immediately after being restarted, 1 day and 1 week afterward. The results of each sampling event would be recorded for comparison.*
- *If the measured VOC concentration does not quickly return to the previous levels this would indicate that preferential channels in the subsurface had formed and prevented the remediation of all of the soils within the ROI. The SVE well would then remain in operation for a minimum of 2 months before contribution of contaminant mass removed is checked again.*
- *If there is no increase in the measured VOC concentration, the soils within the ROI have been remediated and that preferential channels did not impact the operation of the SVE well. The SVE well would then be shut down.*

Following the shut down of all SVE wells within a hot spot and verification that the subsurface has been remediated, confirmation soil borings will be installed. The placement of the confirmation soil

borings will be determined based upon a review of the previous borings and the results of the sampling.

The above information will be added to the final text for the LTRA OU 2 Site 10 Soils.

Comment No. 2 Page 7-7, 1st paragraph, 2nd sentence: Suggest changing the work "locations" to "samples".

Response to Comment No. 2:
The term "samples" will be substituted for "locations" as suggested.

Comment No. 3 Page 7-7, section 7.1.1, #2: Page 6-6, #4 states that plastic should not be used for samples having trace organic analyses done. However, #2 on page 7-7 say a plastic spoon/spatula can be used. Please clarify.

Response to Comment No. 3:
The phrase "...or plastic" will be deleted.

Comment No. 4 {EPA no. 5} Page 7-7, Section 7.1.1, #6: Change "form" to "from." Also how will samples be disposed of?

Response to Comment No. 4 [EPA No. 5]
The term "from" will be substituted for "form".

Comment No. 5 {EPA no. 6} Page 7.8, 1st sentence: Section 3.10 appears to be missing.

Response to Comment No. 5 [EPA No. 6]
The section referenced in this section should be "Section 7.1". This change will be made to the text.

Typos

1. Page 4-6, Section 4.2.1, 2nd paragraph, 1st sentence: Table 7-4 is presented in Section 7.0, instead of Section 6.0 as indicated.

Response:
The table reference will be corrected.

2. Page 7.1, Table: Should 5.7.1, etc. shown on this table read 7.1, etc. instead?

Response:
The table will be changed to reflect the sections listed in the LTRA, e.g. 7.1, 7.2, etc.

3. Page 7-9, #4: Delete "t" at the end of "closet."

Response:
The "t" will be deleted.

4. Page 7-11, 1st #4; Change "with" to "when."

Response:
Text will be corrected.